



Michael J. Willemin

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September 26, 2024

VIA ECF

The Honorable Robyn F. Tarnofsky
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 9B
New York, NY 10007

Re: Parker v. Bursor, Civil Case No. 24 Civ. 245 (JGLC)(RFT)

Dear Judge Tarnofsky:

We represent Plaintiff Angelica Parker in the above-referenced action and write with Defendants' consent to request a one-day extension for Plaintiff to submit her letter response to Defendants' pre-motion conference letter filed September 23, 2024 (Dkt. No. 160).

Per your Individual Rule III(B), our responsive letter is due 3 business days after the filing of Defendants' letter, putting our current deadline at today, September 26, 2024. However, due to a technical error with the Electronic Filing System, Plaintiff was not able to view Dkt. No. 160 on the Electronic Filing System. After alerting Defendants to the issue, Defendants sent Plaintiff a copy of the letter-motion as a courtesy. However, as a result, Plaintiff was only first able to access the document on September 24, 2024.

Plaintiff respectfully requests that the deadline for her response be extended by one day to September 27, 2024, which would provide us the typical 3 business days to respond, starting from the date that we were actually able to view the letter-motion. Defendants have consented to this extension.

This is Plaintiff's first request for an extension of this deadline, and this extension does not require a change in any other scheduled dates. The parties are still prepared to appear for the pre-motion conference on September 30, 2024 (Dkt. No. 165).

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. J. Willemin', is written over a horizontal line.

Michael J. Willemin